#### 7.2.12.4 Gastrointestinal

For currently marketed carbapenems the following adverse clinical events have been noted:

Primaxin I.V. -In the "Adverse Reactions" section of the label, nausea (2.0%), diarrhea (1.8%), and vomiting (1.5%) were reported as possibly, probably, or definitely related to imipenem. Additional adverse events related to the gastrointestinal system that were reported as possibly, probably or definitely drug related occurring in less than 0.2% of patients included: pseudomembranous colitis, hemorrhagic colitis, hepatitis, jaundice, gastroenteritis, abdominal pain, glossitis, tongue papillary hypertrophy, staining of the teeth and/or tongue, heartburn, pharyngeal pain, and increased salivation. Laboratory changes related to the gastrointestinal system that were reported in the label without regard to drug relationship included: increased ALT, AST, alkaline phosphatase, bilirubin, and LDH.

Merrem I. V. - In the "Adverse Reactions" section of the label, the incidence of diarrhea (5.0%) and nausea/vomiting (3.9%) were reported irrespective of the relationship to meropenem. Additional adverse events related to the gastrointestinal system that were reported in greater than 0.1% but less than 1.0% of patients irrespective of relationship to meropenem included: oral moniliasis, anorexia, cholestatic jaundice/jaundice, flatulence, and ileus. Laboratory changes related to the gastrointestinal system that were reported in the label without regard to drug relationship included: increased ALT, AST, alkaline phosphatase, LDH, and bilirubin.

The following table displays adverse events related to the gastrointestinal system that occurred in ≥0.1% of patients receiving ertapenem 1 gm daily during the parenteral period plus 14-day follow-up period.

Medical Officer's Comment: The clinical drug-related and non-drug-related adverse events related to the gastrointestinal system occurred at similar rates between the ertapenem 1 gm group and combined comparator group. The incidences of diarrhea, constipation, nausea, and vomiting for the ertapenem 1 gm appear to be greater than those historical rates reported in the imipenem and meropenem labels, but the rates of diarrhea, historical rates reported in their respective labels.

An ertapenem dose-related incidence of diarrhea, nausea, and vomiting was not as strongly suggested by data in the Phase II and III clinical studies as it had been by data in the Phase I clinical studies.

Clinically significant laboratory adverse events related to the gastrointestinal system occurred at similar rates between the ertapenem 1 gm group and combined comparator group, with the exception of AST increases as was noted in section 7.2.9 of this review.

Based on the Medical Officer's criteria for inclusion of adverse events in the "Adverse Reactions" section of the label the Medical Officer recommends that the following adverse events be included under "Digestive System": acid regurgitation (1.3%), anorexia (0.5%), oral candidiasis (0.9%), cholelithiasis (0.2%), constipation (3.6%), diarrhea (9.7%), Clostridium difficile associated diarrhea (0.4%), duodenitis (0.2%), dyspepsia (1.1%), dysphagia (0.3%), esophagitis (0.2%), flatulence (0.5%), gastritis (0.2%), gastrointestinal hemorrhage (combined adverse experiences of hematemesis, hematochezia, anal/rectal hemorrhage, gastrointestinal hemorrhage, and melena) (0.7%), hemorrhoids (0.3%), ileus (0.3%), jaundice (0.2%), nausea (7.3%), pancreatitis (0.1%), pyloric stenosis (0.1%), stomatitis (0.4%), mouth ulcer (0.2%), and vomiting (3.9%).

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Page Number

# Number (%) of Patients With Gastrointestinal System Clinical Adverse Experiences (Incidence ≥1 % Ertapenem 1 gm Treatment Groups) During Study Therapy and 14-Day Follow-Up Period—All Clinical Studies (Total and Drug Related)

_	Hematochezia	Hematemesis	Glossitis	Gastroesophageal reflux	Gastroenteritis, infectious	Gastritis	Gallbladder disorder	Flatulence	Fistula, perianal, infected	Fistula, intestinal	Fistula, abdominal	recal occult blood	recal abnormality	Esophagitis	Erosive esophagitis	Enterocolitis, pseudomembranous	Edema, tongue	Uysphagia	Dyspepsia	Cupacinis	Duodenitio	Dr. Bout	Dry line	Distention intestinal	Dilation, stomach	associated	Diarrhea Clowridium difficult	Diarrhea	Constipation	Colitis	Cholelithiasis	Cholecystitis	Candidiasis, oral	Biliary disorder	Atony, gastric	Ascites	Anorexia	Acid regurgilation	Abscess, liver	Abscess, appendiceal	Digestive System		
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	(From Reference 46, September 21, 2001 submission)	Vomiting	Varices, esophageal	Ulcer, mouth	Ulcer, gastric	Thirst	Surgery, intestinal, complication	Stomatitis, aphthous	Stomatitis	Sienosis, pyloric	Perionitis	refloration, intestinal	Parising 1	Daroki	Dragoniti	Pain month	Pain and freetal	Obstruction intestinal	Obstruction, bile duct	Neoplasm, tongue, malignant	Neoplasm, liver, metastatic	Nausea	Melena	Liver function abnormality	Liver disorder	Leukoplakia, orai	Lesion, tongue	Jaundice	intubation, gastrointestinal	Intubation, gastric, complication	Infection, intra-abdominal	Infection, dental process	Infection, abdominal wall	Incontinence, fecal	lleus	Hepatomegaly	Hemorrhoids	Hemorrhage, gastrointestinal	Hemorrhage, anal/rectal
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APPEARS THIS WAY

7.2.12.5 Metabolic/Nutritional
For currently marketed carbapenems the following adverse clinical events have been noted:

**Primaxin I.V.** -In the "Adverse Reactions" section of the label there are no specific references to adverse events related to the metabolic/nutritional system.

Merrem I. V. - In the "Adverse Reactions" section of the label, adverse events related to the metabolic/nutritional system that were reported in greater than 0.1% but less than 1.0% of patients irrespective of relationship to meropenem included: peripheral edema and hypoxia.

The following table displays adverse events related to the metabolic/nutritional system that occurred in ≥0.1% of patients receiving ertapenem I gm daily during the parenteral period plus 14-day follow-up period.

Medical Officer's Comment: The clinical drug-related and non-drug-related adverse events related to the metabolic/nutritional system occurred at similar rates between the ertapenem 1 gm group and combined comparation of the comparation of th

Based on the Medical Officer's criteria for inclusion of adverse events in the "Adverse Reactions" section of the label the Medical Officer recommends that the following adverse events be added to the "Adverse Laboratory Changes" section: acidosis (0.4%), hypoglycemia (0.3%), and hypokalemia (0.3%),

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Page Number

Number (%) of Patients With Metabolic/Nutritional System Clinical Adverse Experiences

(Incidence ≥1 % Ertapenem 1 gm Treatment Groups)

During Study Therapy and 14-Day Follow-Up Period—All Clinical Studies
(Total and Drug Related)

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	2	Errapenem		_	Ertapenem 1.5 g	5.8		Ertapenem 2 o	20	Piner	oilling Pro-				
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Dehydration	- 0	(0.1)	<b>-</b>	0	(0.0)	0	0	0.09	_		000	- د	o (	(n.u)	0
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Licel of the Impagance	_	(0.1)	0	-	9	o e		(o.o)	<b>-</b>	24	(0.3)	0	σ\	0.0	-
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Hypomagnesemia	۰ د	(c.)	<b>-</b>	~	(3.1)	0	0	(0.0)	-	٠,	(6.6)	۰ د	7 '	(0.7)	0
Hypovolemia	7 1	(n.1)	0	0	(0.0)	٥	c	3	· c	١ ،	( <del>)</del>	- -	٥	(0.0)	0
Jan Jack	7	(0.1)	0	c	9		• •	9 6	۰,	>	(0.0)	0	0	(0.0)	0
uron denciency	_	(0.1)	_	· c	9 9	-	<b>,</b>	(0.U)	÷	4	(0.5)	0	_		
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(Trought Indicated to September 21, 2001 submission)	JUI subm	ission)							,	-	(0.1)	0	2	(0,2)	0

#### 7.2.12.6 Hematologic

For currently marketed carbapenems the following adverse clinical events have been noted:

Primaxin I.V. -In the "Adverse Reactions" section of the label, hematologic adverse events that were reported as possibly, probably or definitely drug related occurring in less than 0.2% of patients included: pancytopenia, bone marrow depression, thrombocytopenia, neutropenia, leukopenia, and hemolytic anemia. Laboratory changes related to the hematopoetic system that were reported in the label without regard to drug relationship included: increased eosinophils, positive Combs test, increased WBC, increased platelets, decreased hemoglobin and hematocrit, agranulocytosis, increased monocytes, abnormal prothrombin time, increased lymphocytes, and increased basophils.

Merrem I. V. - In the "Adverse Reactions" section of the label, hematologic adverse events that were reported in greater than 0.1% but less than 1.0% of patients irrespective of relationship to meropenem included: anemia. Laboratory changes related to the hematopoetic system that were reported in the label without regard to drug relationship included: increased platelets, increased eosinophils, prolonged prothrombin time, prolonged partial thromboplastin time, decreased platelets, positive direct or indirect Coombs test, decreased hemoglobin, decreased hematocrit, decreased WBC, shortened prothrombin time, and shortened partial thromboplastin time.

The following table displays adverse events, reported by Investigators, related to the hematopoetic system that occurred in ≥0.1% of patients receiving ertapenem 1 gm daily during the parenteral period plus 14-day follow-up period.

Medical Officer's Comment: The clinical drug-related and non-drug-related adverse events related to the hemic and lymphatic system occurred at similar rates between the ertapenem 1 gm group and combined comparator group. However, in the tables of "Clinically Significant Laboratory Abnormalities", absolute neutrophil count <1000 cells/uL occurred at a greater frequency in the ertapenem 1 gm group (see section 7.2.9 for MO's discussion). Given that Dr. Seethaler, the Pharmacology/Toxicology Reviewer, concluded from available preclinical data that the risk of neutropenia was significant, the MO feels that the rate of neutropenia occurring in the clinical studies should be specifically noted as a potential serious adverse reaction in the "Adverse"

Based on the Medical Officer's criteria for inclusion of adverse events in the "Adverse Reactions" section of the label the Medical Officer recommends that the following adverse events be added to the "Adverse Laboratory Changes" section: anemia (1.1%), neutropenia (0.1%), thrombocytopenia (0.1%), and thrombocytosis (0.2%).

Number (%) of Patients With Hemic and Lymphatic System Clinical Adverse Experiences

(Incidence ≥1 % Ertapenem 1 gm Treatment Groups)

During Study Therapy and 14-Day Follow-Up Period—All Clinical Studies

000000000 Ceftriaxone (N=942)<sup>35</sup> (0.6) (0.0) (0.0) (0.0) (6.0) (6.0) (6.0) (6.0) (6.1) 6.0 Piperacillin/Tazobactam (N=774) (F) (S) (0.0) (0.0) (0.0) (0.0) (0.0) (0.1) (0.0) 2 Ertapenem 2 g (N=30) (%) (0.0) (0.0) (0.0) (0.0) (0.0) (0.0) (0.0) (0.0) (0.0) (0.0) (0.0) (0.0) (0.0) (Total and Drug Related) 쫎 Ertapenem 1.5 g (N=64) (0.0) (0.0) (0.0) (0.0) (0.0) (0.0) (0.0) (0.0) (0.0) (0.0) (0.0) (0.0) 8 3.1 2 Ertapenem 1 g (N=1954)<sup>†‡</sup> (From Reference 46, September 21, 2001 submission) 3 (0.00 (1.1) (0.1) (0.1) (0.1) (6.0) (6.1) 3 = lemic and Lymphatic System -cukemia, lymphoid, chronic Disseminated intravascular Arterial pO<sub>2</sub> decreased Coagulation disorder Anemia, hemolytic Leukocytosis Lymphadenitis Lymphadenopathy Phrombocytopenia CO2 increased Thrombocytosis oagulopathy plenomegaly cosinophilia deutropenia

7.2.12.7 Respiratory

For currently marketed carbapenems the following adverse clinical events have been noted:

**Primaxin I.V.** -In the "Adverse Reactions" section of the label, adverse events related to the respiratory system that were reported as possibly, probably or definitely drug related occurring in less than 0.2% of patients included: chest discomfort, dyspnea, hyperventilation, and thoracic spine pain.

Merrem I. V. - In the "Adverse Reactions" section of the label, the incidence of apnea (1.3%) was reported irrespective of the relationship to meropenem. Additional adverse events related to the respiratory system that were reported in greater than 0.1% but less than 1.0% of patients irrespective of relationship to meropenem included: respiratory disorder, dyspnea, pleural effusion, asthma, cough increased, and lung edema.

The following table displays adverse events related to the respiratory system that occurred in ≥0.1% of patients receiving ertapenem 1 gm daily during the parenteral period plus 14-day follow-up period.

Medical Officer's Comment: The clinical drug-related and non-drug-related adverse events related to the respiratory system occurred at similar rates between the ertapenem 1 gm group and combined comparator group

Based on the Medical Officer's criteria for inclusion of adverse events in the "Adverse Reactions" section of the label the Medical Officer recommends that the following adverse events be added to the "Respiratory System" section: asthma (0.2%), bronchoconstriction (0.6%), cough (1.4%), pharyngeal discomfort (0.4%), dyspnea (1.7%), pleural effusion (1.3%), epistaxis (0.4%), hemoptysis (0.2%), hiccups (0.2%), hypoxemia (1.0%), pleuritic pain (0.4%), pharyngitis (1.0%), respiratory insufficiency (combined adverse experiences of respiratory distress, (0.2%).

Number (%) of Patients With Respiratory System Clinical Adverse Experiences During Study Therapy and 14-Day Follow Up Period—All Clinical Studies (Incidence ≥1 % Ertapenem 1 gm Treatment Groups)

Ceftriaxone (N=942)<sup>15</sup> (6.5) (6.3) (6.3) (6.3) (6.3) (6.3) (6.3) (6.3) (6.3) (6.3) (6.3) (6.3) (6.3) (6.3) (0.4) (0.2) (0.7) (0.0) Piperacillin/Tazobactam 0000000000000000 (0.0) (0.0) (0.0) (0.0) (0.0) (0.0) (0.1) (0.1) (0.1) (0.1) (0.0 (0.0 (0.0 (0.0 (0.0 (0.0) (0.3) (0.1) (0.5) (0.6) (0.6) (0.6) (0.6) (0.6) (0.6) (0.6) (0.6) (3.8) 000000000000000000 Erfapenem 2 g (N≈30 ) 0.0 9.00 (9,0) (0.0) (0.0) (0.0) (0.0) (Total and Drug Related) Ertapenem 1.5 g (N=64) 6.0 6.0 6.0 6.0 6.0 6.0 6.0 0.0 (0.00 (0.00) (0.00) (0.00) (9.6) (9.6) (9.6) (1.6) 0.0 0.00 0.00 0.00 0.00 0.00.00 ž Ertapenem 1 g (N=1954 )\*\* (0.5) (0.5) (0.5) (0.5) (0.5) (0.4) (E.E.) (0.00 (0.00) (0.  $\begin{pmatrix} 0.2 \\ 0.2 \\ 0.3 \end{pmatrix}$ hronic obstructive pulmonary disease nfection, respiratory, lower nfection, respiratory, upper hest sound abnormality Veoplasm, lung Veoplasm, lung, malignant iscomfort, pharyngeal ongestion, pulmonary ongestion, respiratory espiratory System ung volume decreased 3 ronchoconstriction ronchitis, chronic fection, respiratory yspnea, exertional ifilirate, pulmonary furmur, respiratory Edema, pulmonary Effusion, pleural ongestion, nasa! lass, mediastinum Nodule, pulmonary Hiccups Hypoventilation Hypoxemia Abscess, lung mitation, nasal telectasis **3 ronchitis** lemoptysis Ty throat труета sthma ny nose pistaxis yspnea aryngilis ongh

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Integrated Safety Summary

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#### 7.2.12.8 Urogenital

For currently marketed carbapenems the following adverse clinical events have been noted:

Primaxin I.V. -In the "Adverse Reactions" section of the label, adverse events related to the urogenital system that were reported as possibly, probably or definitely drug related occurring in less than 0.2% of patients included: acute renal failure, oliguria/anuria, polyuria, and urine discoloration. Laboratory changes related to the urogenital system that were reported in the label without regard to drug relationship included: decreased serum sodium, increased potassium, increased chloride, increased BUN, increased creatinine, and presence of urine protein, red blood cells, white blood cells, urine casts, bilirubin, and urobilinogen.

Merrem I. V. - In the "Adverse Reactions" section of the label, adverse events related to the urogenital system that were reported in greater than 0.1% but less than 1.0% of patients irrespective of relationship to meropenem included: dysuria, kidney failure, vaginal moniliasis, and urinary incontinence. Laboratory changes related to the urogenital system that were reported in the label without regard to drug relationship included: increased creatinine and increased BUN.

The following table displays adverse events related to the urogenital system that occurred in  $\geq 0.1\%$  of patients receiving ertapenem 1 gm daily during the parenteral period plus 14-day follow-up period.

Medical Officer's Comment: The clinical drug-related and non-drug-related adverse events related to the urogenital system occurred at similar rates between the ertapenem 1 gm group and combined comparator group. As was previously discussed in section 7.2.11.6 of this review, pregnancy occurred in one patient (MK-0826 1 gm group) and the pregnancy resulted in a spontaneous abortion. Due to the severity of this adverse event, the preclinical findings reported by Dr. Seethaler, and the lack of additional data relating to pregnancy outcome in humans, the MO feels that this serious adverse event should be specifically noted in the label.

Clinically significant laboratory adverse events related to the urogenital system occurred at similar rates between the entapenem 1 gm group and the combined comparator group.

Based on the Medical Officer's criteria for inclusion of adverse events in the "Adverse Reactions" section of the label the Medical Officer recommends that the following adverse events be added to the "Urogenital System" section: abortion (0.1%), bladder dysfunction (0.2%), vaginal candidiasis (0.2%), hematuria (0.3%), oliguria/anuria (0.4%), vaginal pruritus (0.4%), renal insufficiency (combined adverse experiences of renal insufficiency and acute renal insufficiency) (0.8%), urinary retention (0.3%), vaginitis (1.3%), and vulvovaginitis (0.2%).

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Number (%) of Patients With Urogenital System Clinical Adverse Experiences (Incidence ≥1 % Ertapenem 1 gm Treatment Groups)
During Study Therapy and 14-Day Follow-Up Period—All Clinical Studies (Total and Drug Related)

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		(N=1954) <sup>†‡</sup>	<u></u>	<u> </u>	Ertapenem 1.5	5 g	$\vdash$	Ertapenem 2	20	Pipera	Piperacillin/Tazobactam	bactam		300	
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Neoplasm, vaginal, malignant		) ()	- -	0	(0.0)	0	0	(6)			(a.0)	<b>-</b>	0	(0.0)	0
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Fain, vaginal	_	) (			_	_	0	(0.0)	0		96	-	7 .	(0.2)	0
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Pyelonephritis Renal insufficiency Renal insufficiency, acute

regnancy Pruritus, vaginal

Residual urine Surgery, perineal Trauma, urethra

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Ulcer, penis Urethralgia Urinary frequency Urinary incontinence Urinary retention Urinary urgency

(From Reference 46, September 21, 2001)

Vuľvar disorder Vulvovaginitis

**Jrolithiasis** 'aginitis

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#### 7.2.12.9 Dermatologic

For currently marketed carbapenems the following adverse clinical events have been noted:

Primaxin I.V. -In the "Adverse Reactions" section of the label, rash (0.9%), pruritus (0.3%), and urticaria (0.2%), were reported as possibly, probably, or definitely related to imipenem. Additional adverse events related to the dermatologic system that were reported as possibly, probably or definitely drug related occurring in less than 0.2% of patients included: Stevens-Johnson syndrome, toxic epidermal necrolysis, erythema multiforme, angioneurotic edema, flushing, cyanosis, hyperhidrosis, skin texture changes, candidiasis, and pruritus vulvae. Adverse local clinical reactions that were reported as possibly, probably or definitely related to therapy with imipenem were: phlebitis/thrombophlebitis (3.1%), pain at the injection site (0.7%), erythema at the injection site (0.4%), vein induration (0.2%), and infused vein infection (0.1%).

Merrem I. V. - In the "Adverse Reactions" section of the label, the incidence of rash (1.7%) and pruritus (1.6%) were reported irrespective of the relationship to meropenem. Additional adverse events related to the dermatologic system that were reported in greater than 0.1% but less than 1.0% of patients irrespective of relationship to meropenem included: urticaria, sweating, and skin ulcer. Adverse local clinical reactions that were reported irrespective of the relationship to therapy with meropenem were: inflammation at the injection site (2.4%), injection site reaction (0.9%), phlebitis/thrombophlebitis (0.8%), pain at the injection site (0.4%), and edema at the injection site (0.2%).

The following table displays adverse events, reported by Investigators, related to the dermatologic system that occurred in ≥0.1% of patients receiving ertapenem 1 gm daily during the parenteral period plus 14-day follow-up period.

<u>Medical Officer's Comment:</u> The clinical drug-related and non-drug-related adverse events related to the dermatologic system occurred at similar rates between the ertapenem 1 gm group and combined comparator group. Rates were also similar to those reported historically in the imipenem and meropenem labels.

Based on the Medical Officer's criteria for inclusion of adverse events in the "Adverse Reactions" section of the label the Medical Officer recommends that the following adverse events be added to the "Skin & Skin Appendage" section: dermatitis (0.3%), desquamation (0.2%), erythema (1.4%), flushing (0.2%), pruritus (1.4%), rash (2.4%), sweating (0.6%), and urticaria (0.2%).

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Number (%) of Patients With Dermatologic Clinical Adverse Experiences (Incidence ≥1 % Ertapenem 1 gm Treatment Groups)

During Study Therapy and 14-Day Follow-Up Period—All Clinical Studies (Total and Drug Related)

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		(N=1954) <sup>#</sup>	۰.	1	trrapenem 1.5 (N≅64.)	25. 28.	_	Ertapenem 2	54	Pipera	Piperacillin/Tazobactam	0bactam		900		- 1
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#### 7.12.3 Overall ISS Conclusion

Based on the Integrated Summary of Safety review, the Medical Officer recommends approval of ertapenem sodium 1 gm daily administered for up to 14 days intravenously or 7 days intramuscularly for the indications in which efficacy has been demonstrated. Based on data provided in the ertapenem NDA the following conclusions can be made:

- Overall, clinically significant clinical and laboratory adverse events and treatment-related adverse events, occurring in the study therapy and 14-day follow-up periods, for ertapenem 1 gm daily (intravenous or intramuscular administration) in the Phase II and III clinical studies were similar to those of the approved comparator drugs (piperacillin/tazobactam and ceftriaxone).
- Overall, the rates of serious clinical and laboratory adverse events and dropouts, occurring in the study therapy and 14-day follow-up periods, for ertapenem 1 gm daily (intravenous or intramuscular administration) in the Phase II and III clinical studies were similar to those of the approved comparator drugs (piperacillin/tazobactam and ceftriaxone).
- There was a non-statistically significant trend for a greater number of deaths in the ertapenem 1 gm group in the pivotal complicated intra-abdominal infections study (P017).
- The rate of seizures (combined adverse events of seizure disorder, seizure-focal, and seizure-grand mal) that occurred in the study therapy plus 14-day follow-up period was 0.5% for patients in the ertapenem 1 gm group and 0.1% for patients in the combined comparator group. The rate of drug-related seizures (combined adverse events of seizure disorder, seizure-focal, and seizure-grand mal) that occurred in the study therapy plus 14-day follow-up period was 0.2% for patients in the ertapenem 1 gm group and 0.1% for patients in the combined comparator group. Based on a comparison with historical rates for "seizure" as an adverse event, ertapenem appears to fall between imipenem and meropenem as regards to the frequency of seizures reported overall or as drug-related, with imipenem reported to have the highest frequencies and meropenem the lowest.
- Regarding other adverse events commonly reported for beta-lactam antimicrobials, the incidence of rash, diarrhea, C. difficile associated disease, nausea, vomiting, and headache were similar for ertapenem 1 gm and comparator drugs.
- Based on review of clinically significant laboratory abnormalities occurring during the study therapy plus 14-day follow-up period, AST increase and absolute neutrophil count <1800 cells/uL and <1000 cells/uL were slightly more common in the ertapenem 1 gm group, but in general changes were transient and did not result in clinically significant adverse events.</p>
- Intravenous infusion of ertapenem 1 gm is generally well tolerated for up to 14 days with respect to local tolerability in comparison to ceftriaxone and piperacillin/tazobactam.
- Intramuscular administration of ertapenem 1 gm is generally well tolerated with respect to local tolerability in comparison to ceftriaxone 1 gm.
- Ertapenem appears to be well tolerated irrespective of gender, however, it should be noted that in the one female patient (in ertapenem 1 gm group) that was pregnant in

the clinical studies, a spontaneous abortion occurred after 6 days of ertapenem therapy.

- Adverse event rates, although higher overall, were comparable across all study drugs for patients greater than 65 years old and for patients with renal dysfunction (Cr<sub>CL</sub> <60 mL/min/1.73m<sup>2</sup>).
- Adverse event rates were similar across all study drugs when examined by patient race.

Based on the Medical Officer's review of the Integrated Summary of Safety, the Medical Officer recommends the following additional information be provided by the Applicant as Phase IV commitments:

- A final study report for study 035, "A Randomized, Double-Blind, Parallel-Panel, Placebo-Controlled Study to Investigate the Effects of Maximum Plasma Concentrations of MK-0826 on QTc Interval Following Single IV Dose Administration in Healthy Subjects."
- A statistically adequate and well controlled study in patients with complicated intraabdominal infections that compares death rate during the parenteral therapy period and at a 4 to 6 week follow-up visit.

The Medical Officer's recommendations for revisions to the "Warnings," "Precautions," and "Adverse Experiences" sections of the Applicant's proposed label are in Appendix 30.

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VIII. Dosing, Regimen and Administration Issues

Based on the demonstration of the non-inferiority of ertapenem to the FDA approved comparators utilized in the pivotal clinical studies, ertapenem 1 gm intravenously once daily appears to provide adequate antimicrobial coverage for the treatment of the requested indications. In Phase IIa studies and for a limited number of patients in the Applicant's Phase IIb intra-abdominal infections study (P017) doses of 1.5 gm and 2 gm once daily were evaluated; however, there did not appear to be an efficacy advantage at the higher doses and the incidence of both clinical and laboratory adverse experiences were higher. The efficacy of ertapenem doses less than 1 gm daily or for durations of therapy different than those studied in the Phase IIb/III clinical development program have not been investigated.

Based on Phase I studies, the bioavailability of ertapenem 1 gm administered intramuscularly is approximately 90% of the bioavailability of a dose of 1 gm administered intravenously over 30 minutes. Based on pharmacodynamic modeling, IM administration of ertapenem is predicted to provide adequate time above the MIC (MIC of 4.0 ug/mL) to adequately treat infections caused by sensitive organisms for the indications sought by the Applicant. While the Applicant has not provided a statistically adequate clinical study to demonstrate the efficacy of IM administration of ertapenem, they have provided a safety database for >100 patients (derived from P020, P021, and P029) that received IM ertapenem (as was agreed to at the End-of-Phase II meeting). The safety database supports the conclusion that ertapenem 1 gm IM once daily for up to 7 days is at least as well tolerated as ceftriaxone 1 gm IM once daily. For a full review of study 029 see Appendix 29.

The pharmacokinetics of a single 1 gm dose of ertapenem administered intravenously were investigated in 26 adult subjects with varrying degrees of renal impairment. Based on the results of this study the Applicant has proposed, and the FDA Clinical Pharmacology/ Biopharmaceutics review team has agreed, that the dose of ertapenem should be reduced to 500 mg once daily in patients with creatinine clearance ≤30 mL/min/1.73 m². Because approximately 30% of the dose is removed by a 4-hour hemodialysis session, for patients on hemodialysis a supplementary 150 mg postdialysis dose is recommended if the ertapenem dose has been given within 6 hours prior to hemodialysis.

#### IX. Use in Special Populations

#### Gender, Age, Race Effect

The Applicant performed analyses on the pivotal Phase IIb/III studies according to the subgroups of gender, age, and race. Based on these analyses the efficacy of ertapenem was similar to comparator drugs for males and females, for patients aged <65 years or ≥65 years, and for "Caucasian" and "Hispanic" patients. For "Black," "Mestizo," and "Other" patients there was a trend (based on point estimates) for greater efficacy in the ertapenem group. The following table displays the overall efficacy response by gender, age, and race.

> Overall Primary Efficacy Response<sup>†</sup> In the Primary Efficacy Population;

<u>-</u>	<del></del>		enem	Com	parator
			1171)		1038)
By Gender	<del></del>	<u>l n/m</u>	(%)	n/m	( <u>%</u> )
By Age	Female Male	560/619 485/552	(90.5) (87.9)	486/547 432/491	(88.8)
	<65 years	794/878	(90.4	687/774	
By Race	≥65 years	251/293	(85.7)	231/264	(88.8) (87.5)
	Caucasian	555/636	(87.3)	483/544	
	Black Hispanic	128/140	(91.4)	108/126	(88.8) (85.7)
	Mestizo	265/290 68/73	(91.4) (93.2)	232/259 69/77	(89.6) (89.6)
The primary efficacy respon	Other <sup>§</sup>	29/32	<u>(9</u> 0.6)	26/32	(81.3)

The primary efficacy response displayed is the clinical response in Skin and Skin Structure Infections, Pelvic Infections, and Community-Acquired Pneumonia, the microbiological response in Urinary Tract Infections, and the combined clinical and microbiological response in Intra-abdominal Infections.

The primary efficacy population used was the clinically evaluable population in Skin and Skin Structure Infections, Pelvic Infections, and Community-Acquired Pneumonia, and the microbiologically evaluable population in Urinary Tract Infections and Intra-abdominal Infections.

Other includes Latin American, Asian, Philippina, Indian, Spanish, Polynesian, Mexican, Mulatto, Spanish American, Colored, Armenian, Maori, Mixed, Hispanic/White, African, and

N = Total number of patients in the treatment group

n/m = Number of patients with favorable response in category/number of patients in category.

(Compiled from Applicant's Tables D-46, D-47, and D-48, Volume 1 of 22)

With the exception of nausea and vomiting, which occurred more frequently in females, the incidence of clinical and laboratory adverse experiences were similar in males and females.

The overall patterns of clinical adverse experiences and laboratory adverse experiences were generally similar for patients ≥65 years and <65 years. As might be expected in an older population that has a greater number of co-morbid conditions and a higher frequency of concommitant medication use, the frequencies of adverse experiences were often increased. However, the increased frequencies of specific adverse events appeared to be balanced across the ertapenem 1 gm and combined comparator groups, signifying that no signal was present in the data base to suggest that ertapenem specific drug toxicity was increased in patients ≥65 years old.

The incidence of clinical adverse experiences were similar across racial groups for the ertapenem 1 gm and comparator groups. The majority of laboratory adverse experiences were also similar across groups with the exception of a slightly higher incidence of AST >5x ULN in "Hispanic" patients and ANC <1000 cells/uL in "Other" patients in the ertapenem 1 gm group. However, within the Applicant's "Other" group, it did not appear that one specific race was at increased risk of ANC <1000 cells/uL.

#### Pediatric Program

The Applicant submitted plans for a Pediatric Development Program and a prompt for a Written Request for Pediatric Studies. In response, the Agency issued a Written Request for Pediatric Studies (WR) to the Applicant in May, 2000. The WR requested that the Applicant perform a total of five studies in pediatric patients aged 3 months through 17 years. Based on the protein binding characteristics of ertapenem, the Agency concurred with the Applicant that its use in patients <3 months may result in significant displacement of hilirubin from albumin resulting in kernicierus. Therefore the requirement to study pediatric patients <3 months old has been waived. The five studies requested in the WR included:

- Study 1: An open-label, intravenous study to evaluate the plasma concentration profiles of MK-0826 in pediatric patients
- Study 2: An open-label, multicenter study to evaluate the cerebrospinal fluid concentration profile of MK-0826 after intravenous administration in pediatric patients with meningitis
- Study 3: A prospective, multicenter, randomized, comparative study to evaluate the safety, local tolerability and clinical outcome of MK-0826 versus comparator (to be named) in pediatric patients with hospital acquired pneumonia, intra-abdominal infection, or acute pelvic infection
- Study 4: A prospective, multicenter, double-blind, randomized, comparative study to evaluate the safety, local tolerability and clinical outcome of MK-0826 versus ceftriaxone sodium in pediatric patients with community acquired pneumonia, complicated urinary tract infection, or skin infection
- Study 5: A prospective, multicenter, randomized, comparative study to evaluate the safety, local tolerability and efficacy of MK-0826 versus comparator (to be named) in pediatric patients for the treatment of acute bacterial meningitis

The Applicant has recently completed Study 1. Protocols for studies 2, 3, and 4 have been submitted to the FDA for review and these studies are currently ongoing or expected to begin enrollment shortly. Per the WR, reports of the above studies must be submitted to the Agency on or before November 30, 2004.

#### Renal Impairment

The overall patterns of clinical adverse experiences and laboratory adverse experiences were generally similar for patients with normal renal function (≥60 mL/min/1.73 m²) and patients with decreased renal function (<60 mL/min/1.73 m²); however, as might be expected in a population with impaired renal function with a greater number of comorbidities and concommitant medications the frequencies were often increased. The increased frequencies of specific adverse events appeared to be balanced across the ertapenem 1 gm and combined comparator groups. Therefore, it is unlikely that ertapenem specific drug toxicity was increased in patients with creatinine clearance <60 mL/min/1.73 m².

#### Hepatic Impairment

The Applicant has not conducted any Phase I studies in subjects with hepatic impairment; however, based on Phase I study data provided, it is expected that hepatic clearance accounts for <10% of the total clearance of ertapenem. At the Medical Officer's request the Applicant performed an analysis of adverse experiences by degree of hepatic impairment (Child-Pugh class) for patients enrolled in the Phase II and III studies. These analyses were submitted on October 1, 2001. The overall patterns of clinical adverse experiences and laboratory adverse experiences were generally similar for patients with hepatic impairment; however, as might be expected in a population of patients with hepatic impairment and a greater number of co-morbidities and concommitant medications the frequencies were often increased. The increased frequencies of specific adverse events appeared to be balanced across the ertapenem 1 gm and combined comparator groups. Therefore, it is unlikely that ertapenem specific drug toxicity was increased in patients with hepatic impairment.

#### Use in Pregnancy

No clinical studies regarding use of ertapenem in pregnancy have been performed. For details of pregnancy outcome in the one pregnant patient that received ertapenem in the Applicant's clinical development program please see section 7.2.11.6 of this review.

#### X. Conclusions and Recommendations

Provided a label can be agreed upon between representatives of Merck and ODE IV, the Medical Officer recommends that an approval be granted for ertapenem for the indications of: complicated intra-abdominal infections, skin and skin structure infections, community acquired pneumonia, complicated urinary tract infections including pyelonephritis, and acute pelvic infections including postpartum endomyometritis, septic abortion and post surgical gynecologic infections.

Based on the available efficacy and safety data, the benefit of ertapenem as a therapeutic antimicrobial for the above indications outweighs the risks of administration. In the Applicant's clinical studies, the overall toxicity profile of ertapenem was similar to that of the β-lactam antimicrobials (piperacillin/tazobactam and ceftriaxone) to which it was compared with one notable exception. A higher percentage of deaths occurred in the ertapenem 1 gm group than in the comparator group in the complicated intra-abdominal study. Although, this finding is potentially explainable by a greater severity of illness in the ertapenem group, until more data are available the "Adverse Reactions" section of the label should reflect this important finding. In addition, the Medical Officer recommends that the Applicant perform, as a Phase IV commitment, a double-blind, randomized, statistically adequate study that assesses the death rate at the end of parenteral therapy and at 28 days post therapy in adult patients with complicated intra-abdominal infections.

While carbapenems have not historically been associated with intracardiac conduction delays, the Applicant has not provided the final results of their recently completed Phase I study (P035) that addresses this issue in subjects receiving ertapenem. Therefore the Medical Officer recommends that submission of the final study report for P035 be required as an additional Phase IV commitment.

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IX. Appendices

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#### Appendix 1

#### **Protocol 017**

Schedule of Clinical Observations and Laboratory Measurements

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(Applicant's Table 1, Volume 13 of 22, page 42)

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#### Appendix 2

#### Protocol 017

### Patient Accounting (Randomized Population)

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	MK-0826	MK-0826	Piperacillin/	
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ENTERED	707			
Male (age range)	323	14	328	665
Female (age range)	193 (17 to 87)	11 (20 to 79)		410 (17 to 87)
COMPLETED THERAPY	130 (18 to 92)	3 (48 to 72)	122 (18 to 92)	255 (18 to 92)
DISCONTINUED THERAPY	264	9	271	544
Clinical adverse experience	59	5	57	121
Laboratow adverse experience	17	0	18	35
Laboratory adverse experience Lost to follow-up	] 1	0	. 2	3
Deviation from	0	0	1 0	1 5
Deviation from protocol Withdrew from study	6	0	8	14
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Inclusion/exclusion criteria not met	9	0	5	14
Clinical/microbiologic failure Patient withdrew consent	12	2	19	33
Clinical trial terminated	4	1	4	ا وُ
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Pathogen resistant Death	3	0	0	ŝ
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COMPLETED STUDY	Ī	0	0	1
DISCONTINUED STUDY	256	10	248	514
Clinical advanta and an	67	4	80	151
Clinical adverse experience	17	0	23	40
Laboratory adverse experience Lost to follow-up	1	0	1	2
Deviation from protocol	15	0 .	11	26
Withdrew from study	3	0	7	10
Inclusion/exclusion criteria not met	ı	1	1 1	3
Clinical/missabistasis 6.4	7	0	3	10
Clinical/microbiologic failure Patient withdrew consent	13	ī	30	44
Pathogen resistant	4	1	4	
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(Applicant's Table 9, Volume 13 of 22, page 80)

## Patient Accounting (Microbiologically Evaluable Population)

	MK-0826	MK-0826 1.5 g	Piperacillin/ Tazobactam	Total
ENTERED: Male (age range) Female (age range) COMPLETED THERAPY DISCONTINUED THERAPY Clinical adverse experience Laboratory adverse experience Lost to follow-up Deviation from protocol Clinical/microbiologic failure Patient withdrew consent COMPLETED STUDY DISCONTINUED STUDY Clinical adverse experience Laboratory adverse experience Lost to follow-up Deviation from protocol Clinical/microbiologic failure Patient withdrew consent	203 133 (17 to 87) 70 (18 to 89) 190 13 7 0 0 0 5 1 192 11 8 0 0 0 2 1	7 4 (20 to 73) 3 (48 to 72) 7 0 0 0 0 0 0 7 0 0 0 0 0 0 0 0 0 0 0	207 137 (17 to 85) 70 (18 to 89) 190 17 6 1 0 0 10 0 183 24 4 1 0 0	417 274 (17 to 87) 143 (18 to 89) 387 30 13 1 0 0 15 1 382 35 12 1 0 0

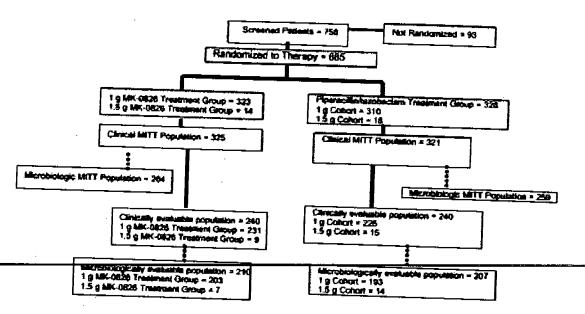
(Applicant's Table 10, Volume 13 of 22, page 81)

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ON ORIGINAL

#### Appendix 3

#### **Protocol 017**

#### Profile of Patient Enrollment



(Applicant's Figure 1, Volume 13 of 22, page 90)

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Protocol 017

Appendix 4

Summary of Patients For Whom Evaluabilty and/or Outcome Changes Were Made By the Medical Officer

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	*atient received non-study antibiotic prior to FU for treatment of UTI. Therefore the MO considered patient unevaluable with indeterminate utcome.	Patient considered unevaluable by Applicant due to baseline intercurrent medical event. MO did not appreciate any such event in the CRF. Therefore the MO considered the nations are the considered the considere	visit noted that the patient had received a non-study antibiotic for a wound infection the prior week, which would have occurred within window. Therefore the MO considered the patient evaluable with failure outcome.	evaluable with failure outcome (potential bleed due to infection erroding at original surgical site).	Entry culture did not contain pathogen susceptible to study antibiotics.  Patient readmitted with UGI bleed and fever, no source documented and treated with empiric antibiotics.	Patient received 29 days of study drug therapy and an additional day of non-study antibiotic therapy. Since the patient required more than 120% duration of study therapy and additional antimicrobial the MO considered the patient outcome to be 6.1.	ration was discontinued from study drug for both confusion and wound infection, which occurred concurrently, and received additional non-study antibiotic therapy. Therefore the MO considered the patient to have an outcome of failure		MO Comment

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o FU. Therefore MO considered patient unevaluable with indeterminate outcome.	atient given non-study antihiotic for the state of the st	Patient given non-study antibiotic for treatment of UTI prior to FU.  Therefore MO considered patient unevaluable with indicate.	prior to FU. Therefore MO considered unevaluable with indeterminate outcome.	Patient given non-study antibiotics as UTI prophylaxic and the study antibiotics as UTI prophylaxic and the study	be given for continued intra-abdominal coverage and considered the patient evaluable with failed out.	Patient given oral non-study antibiotic at the end of IV study drug with	study drug. Therefore MO considered outcome	Considered patient unevaluable with indeterminate outcome.	changes, then developed pneumonia and was taken off study and placed on non-study antibiotics to treat pneumonia. Therefore MO	discontinuing study drug that was being managed only with decisions.	Patient developed with indeterminate outcome.	ratient received course of non-study antibiotic for H.pylori prophylaxis prior to FU. Therefore MO considered patient clinically	MDs opinion could be ignored and considered outcome to be failure	antibiotic by private MD. Investigator did not see patient until 6 days later and felt patient had not needed antibiotic MO did not 6-1	Patient was treated for wound infection for 2.3.4	MO Comment

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	Patient discharged to NH on IV study drug and then readmitted to nospital for N/V and dehydration at which point they received one lose of ceftriaxone and the investigator took patient off study due to alternate antibiotic being given. Therefore MO considered patient anevaluable with indeterminate outcome.	Patient received non-study antibiotics for the treatment of pneumonia prior to FU. Therefore the MO considered patient unevaluable with indeterminate outcome.	Patient received multiple other non-study antibiotics for treatment of sinus infection and sepsis prior to FU. Therefore MO considered patient unevaluable with indeterminate.	Patient received oral flagyl to treat C dificile during course of study therapy. Therefore MO considered patient unevaluable with	Patient received tobramycin while on study therapy and additional oral antibiotics as follow-up to study therapy. MO considered patient unevaluable prior to oral therapy due to concomitant Tohramycin with	minimal disease definition to be included in MITT population.  Patient received non-study antibiotic for treatment of UTI. Therefore	Patient had PID. Therefore MO did not considered national met	Patient given non-study antibiotic for treatment of UTI prior to FU.  Therefore MO considered patient unevaluable with indeterminate	MO Comment

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	Attent received non-study antibiotic during IV study period (3d flagyl) or diarrhea. Therefore MO considered patient unevaluable with ndeterminate outcome.	Patient unevaluable with indeterminate outcome.  Patient given non study antibiotic (flagyl) for treatment of diarrhea with the considered patient unevaluable with	Indeterminate outcome.  Patient removed from study and treated with alternative non-study antibiotics when found to have empyema. Therefore MO considered	considered patient evaluable with failure outcome.  Patient received non-study antibiotics for possible infected knee prior to FU. Therefore MO considered the patient unevaluable.	Patient improved on study therapy, but sent home on oral antibiotic for continued treatment of intra-abdominal infection.	Patient improved on study therapy, but sent home on oral antibiotics for continued intra-abdominal infection covering.	Patient was given non-study antibiotic for wound infection by family MD, which surgeon stopped several days latter. MO felt could not exclude true infection since surgeon did not see patient for several	Fatient given course of flagyl for C. difficile spanning IV study drug and FU period. Therefore MO considered patient unevaluable with indeterminate outcome.		AO Comment	

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Patient was discontinued from study after 24 hours of therapy due to epsis and acute renal failure requiring dialysis and placed on alternate intimicrobials. Since patient had not received 48 hours of therapy, the MO considered outcome as indeterminate.	Patient was treated with non-study antibiotics prior to FU visit.  Therefore the MO considered the patient unevaluable with	Patient given additional oral antibiotic after study drug for "phtegmon prophylaxis". Therefore MO considered patient evaluable with	Patient was discontinued from study therapy due to acute renal failure and continued on alternate antimicrobial therapy. Since not discontinued due to failure. MO considered actions	evaluable.	Applicant considered unevaluable due to baseline micro exclusion.  Patient had Enterococcus spp., B. buccae, Lactobacillus spp. and C. albicans on entry peritoneal fluid culture. Since anaerobes generally would be expected to be sensitive the MO consideration.	Patient received alternate antibiotic therapy for a line infection prior to FU. Therefore MO considered patient unevaluable with indeterminate outcome.	1	MO Comment

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	atient developed pneumonia and was treated with non-study ntibiotics prior to FU. Therefore the MO considered patient nevaluable with indeterminate outcome.	surgery to be inadequate and patient to be unevaluable.	retained common bile duct stone. Therefore MO considered initial	Patient readmitted prior to Eliminate	had to have subsequent surgery due to failure of the initial procedure.  MO considered initial procedure inadequate therapy so MO considered	Patient initially had a CT guided aspiration/drainage	Patient developed pneumonia and was treated with alternate antibiotics before FU visit. Therefore MO considered unevaluable with indeterminate outcome	with an indeterminate outcome.	and can not determine how many doses of non-study antibiotic the patient received. The MO therefore considerately	Patient was given another notice to the control of	railent given non-study antibiotic for treatment of dental infection prior to FU. Therefore MO considered patient unevaluable with	failure as outcome.	non-study oral antibiotics for prophylaxis against recurrence of intra- abdominal infection. Therefore MO considered nations are limited.	Patient received 4 days study those and the state of the	MO Comment	

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herefore MO considered patient evaluable with failure outcome.	atient improved on study therapy, but sent home on oral antibiotics	Patient was given non-study oral antibiotic following study drug for ontinued therapy of intra-abdominal infection. Therefore MO onsidered patient evaluable with failure outcome.	neumonia prior to FU. Therefore MO considered patient unevaluable with indeterminate outcome.	atient received multiple non-study antibiotics for treatment.	Patient readmitted with SBO and got 2 days non-study antibiotics that investigator says were given in error not due to infection. Therefore	Patient did not meet criteria for complicated appendicitis. Patient received 2 courses of non-study antibiotics for strep throat and shoulder infection prior to FU. Therefore MO considered patient to have indeterminate outcome.	patient unevaluable with indeterminate outcome.	infection was not present at re-operation according to operative report.  Patient got 6 days peri-op "prophylaxis" (ancef) and additional non-study antibiotic to treat UTI prior to FU. Therefore MO consideration	Patient was readmind and the	Patient got additional antibiotics for "post-graft" prophylaxis (>24 hours) prior to FU. Therefore MO considered patient unevaluable with	Patient received non-study antibiotics prior to FU for treatment of UTI. Therefore MO considered patient to have indeterminate outcome.		AO Comment	

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1=favorable outcome/cure 0=unfavorable outcome/failure 1=indeterminate outcome Blank cell=no data available (considered indeterminate in analyses)	o=outcome change Y=evaluable N=unevaluable	e=evaluability change		0		e,0			e,0	Discrepancy in evaluability (e) and/or outcome (o)	-
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		persistent infection. MO considered outcome indeterminate based on data provided in CRF	Patient thought to have persistent infection and treated with non-study antibiotics but autopsy attributed death to PE and no mention of	considered patient unevaluable with indeferminate outcome	Patient developed SBO (not thought to be infected), but received 3 days of assorted non-study antihiotics prior to but the control of the state of the control of the contr	therefore MO considered initial procedure inadequate and patient unevaluable.	Patient failed after initial procedure of percutaneous drainage	Patient received non-study antibiotic for treatment of pneumonia prior to FU. Therefore MO considers patient unevaluable with indeterminate	N	MO Comment	

#### Protocol 017

### Appendix 5

# Patient Accounting of Evaluability (Randomized Population)

Reasons Not Evaluable		MK-0826 1 g (N=323)		MK-0826 1.5 g (N=14)	[ Tax	eracillin/ zobactam N=328)
Clinical Protocol Evaluable Population	n n	(%)	n	(%)	- <u>n</u> ''	(%)
Clinical protocol evaluable					<del></del>	170)
Clinical protocol nonevaluable	231	(71.5)	9	(64.3)	240	(72.3)
Disease definition not met	92	(28.5)	3	(35.7)	88	(73.2)
Test-of-cure window violation	8	(2.5)	Ó	(0.0)	10	(26.8)
Inadequate/inappropriate study therapy	24	(7.4)	0	(0.0)	26	(3.0)
Prior antibiotics violation	32	(9.9)	ī	(7.1)	23	(7.9)
Concomitant antibiotics violation	6	(1.9)	1 1	(7.1)	7	(7.0)
Baseline/intercurrent medical events	1.3	(4.0)	l i	(7.1)	13	(2.1)
Reseline migrobiology and events	12	(3.7)	0	(0.0)	13	(4.0)
Baseline microbiology-resistant pathogen Other	6	(1.9)	l i	(7.1)	7	(2.7)
	0	(0.0)	l i	(7.1)		(2.1)
Inadequate surgical source control	9	(2.8)	Ò	(0.0)	2	(0.6)
Missakistasis 6	1	, <i>,</i>	1 *	(0.0)	13	(4.0)
Microbiologic Protocol Evaluable Population	1		1		1	
Microbiologic protocol evaluable	203	(62.8)	7	(50.0)		
Microbiologic protocol nonevaluable	120	(37.2)	1 7	,	207	(63.1)
Not clinically evaluable	92	(28.5)	5	(50.0)	121	(36.9)
Baseline microbiology not performed/inadequate		(1.5)	<del>  3</del> -	(35.7)	88	(26.8)
Baseline microbiology-no pathogen isolated	47	(14.6)	3	(0.0)	1.	(0.3)
	1	(14.0)	,	(21.4)	53	(16.2)
Clinical MITT Population	I				1	
Clinical MITT evaluable	311	(96.3)	14	(100)	1	
Clinical MITT nonevaluable	12	(3.7)	ı	(100)	321	(97.9)
Patient did not receive at least 1 dose of study	7	(2.2)	0	(0.0)	7	(2.1)
therapy .	1 '	12.2)	U	(0.0)	] 3	(0.9)
Minimal disease definition not met	3	.0.0\				
Pharmacy dispensing errors preclude evaluability	2	(0.9)	0	(0,0)	3	(0.9)
	*	(0.6)	0	(0.0)	1	(0.3)
Microbiologic MITT Population	j		1		ł	
Microbiologic MITT evaluable	256	(30.3)	_		ĺ	
Microbiologic MITT nonevaluable	67	(79.3)	8	(57.1)	259	(79.0)
Not clinically MITT evaluable	12	(20.7)	6	(42.9)	69	(21.0)
Baseline microbiology not performed/inadequate	4	(3.7)	0	(0.0)	7	(2.1)
Dascune microbiology-no nathogen icologic	47	(1.2)	0.	(0.0)	l 1	(0.3)
Follow-up microbiology inadequate his table contains courts of patient evaluability. onevaluable, the patient was counted only once in the		(14.6)	3	(21.4)	53	(16.3)
	_ <u>_</u>	(2.5)	-			

MITT = Modified intent-to-treat approach.

(Applicant's Table 13, Volume 13 of 22, page 92)

# Protocol 017

# Appendix 6

# Number of Patients Entered by Investigator and Treatment Group According to the Applicant

Stu Num				N	ИK-082	pulation 26 1gm	<u> </u>	MK	0826 1	.5 gm	<del></del> _	Din.	<del></del>
-		- Jordinii		ļ	(N=3		$\bot$	_	(N=14	)	1	Piperac Tazoba (N=32	ctam
001 002	Simms, H. Hank	Providence, RI		Enrol.			val F	nroll	Eval	% Ev	al Eroll	Eval	
003	Wilson, Eric	Orange, CA		5	1	209		0	0		5	1	20%
004	Solomkin, Joseph S Hassett, James M.			3	1	60% 33%	_	0	0	-	4	3	75%
005	Lucasti, Christophe	Buffalo, NY		14	ģ	64%	-	0	0	-	1 1	0	7576
006	Gilbert, David N.		J	14	<b>8</b>	57%	- 1	0 4	0	-	14	11	79%
007	Yellin, Albert E.	Portland, OR	ŀ	2	2	1009	-	0	3	75%	23	14	61%
008	Postier, Russell	Los Angeles, CA	j	26	12	46%	- 1	0	0	-	2	1	50%
009	Harrison, Paul B.	Oklahoma City, OK	- 1	7	2	29%	- I	0	0	-	24	15	63%
010	Bankey, Paul	Wichita, KA	- 1	3	3	100%	·	Ö	-	-	9	7	78%
011	Fulda, James Gerard	Worcester, MA	ĺ	1	0	100,	- 1	i	0	-	1	. 0	-
012	Klein, Stanley	F	- 1	5	1	20%		i		-	1	0	_
013	Wittmann, Dietmar	Torrance, CA	1	15	9	60%		Ö	1 0	100%	6	3	50%
014	Diebel, Larry		- 1	2	0			ì	0	-	16	9	56%
015	Bennion, Robert C.	Detroit, MI	- 1	4	0	_		Ô		-	1	1	100%
016	Metzler, Michael H.	Sylmar, CA Columbia, MI	- 1	2	2	100%		0	0	-	4	l	25%
017	Mangiante, Eugene	Columbia, MI	- 1	5 -	- 4	80%	1		0	-	2	1	50%
019	Fry, Donald E.	Memphis, TN	1	2	2	100%			0	-	4	2	50%
022	Barie, Philip	Albuquerque, NM	i	8	4	50%	ا أ		0	-	3	1	33%
023	Bauwens, Eric J.	New York, NY Phoenix, AR		2	1	50%	Ιŏ		Ö	-	7	4	57%
023	Messick, William	Charlette NG	<del></del>	<u>R</u>			1 6				3	_ 2	67%
	Joseph/Miles,	Charlotte, NC	ı	0	0	-	l ŏ		0	30%	14	10	71%
	Scherer William	1	- 1				1 "		U	-	1	1	100%
27	Christou, Nicholas V.	Canada	ı				1			- 1			1
29	Rotstein, Ori D.	Canada Canada	- 1	14	8		0		0	ľ			- 1
30	Lew, Daniel Pablo	Canada Switzerland	- 1	5	3	60%	l ŏ		0	-	14	5	36%
31	Lange, Jochen	Switzerland Switzerland	- 1	6	2	_ 33%	ľŏ		0	- 1	5	4	80%
32	Ocampo Gonzalez, Sa	DWIZERIAND	- 1	4	4	100%	lŏ		0	- 1	3	2	67%
3	Velasquez Burgos, Jua	n Colombi	- 1	6	5	83%	ا		0	-	6	5	83%
34	Letelier, Luz Maria	Chile		5	3	60%	ŏ		)	-	5	3	60%
35	Buechler, Markus W.	Switzerland	- 1	9	5	56%	ő		) )	-	5	3	60%
5 /	Jasovich, Abel	Argentina	- 1	4	2	50%	ő	(		-	11	7	64%
38	Barboza, E.	Peru	- 1	4	1	25%	Ö	(		- [	3	3	100%
39	Betancure Martinez, J	Columbia	1	1	10	91%	ŏ	0		-	5		80%
₩ į	Ribas Filho, Jurandir	Brazil		2	2	100%	ő	0		-	9		89%
1	Lunstedt, B.	Germany		2.	18	82%	ŏ	Ö		-	3	0	- ]
3	Stratchounski, Leonid	Russia		2	2	100%	ő	0		-	22		77%
4 [	Vainrub, Bernardo	Venuzuela	1 '	•	7	78%	ŏ	0		-	1		100%
5 j	Ozier, Yves	France	1		1	100%	ŏ	ő		-	9	6	- }
6 <u>j</u> a	Poisson, Michel	Canada	] 3		2	67%	0	0		-	0	0	- [
7 p	Bohnen, John M.A	Canada	4		3	75%	ŏ	0		-	2		50%
ŏ ∤	loun, Michael	France	0	I	0	-	ŏ	0		-	_		57%
y pr	Donini, Ippolito	Italy	1		0	- 1	ő	0		·			00%
v p	alvestrini, Frances	Italy	3		1	33%	ŏ	0	•	٠	_		00%
ı II	rignano, Mario	italy Italy	2		0	- 1	ŏ	0	-	.	_	0	-
: [0	u Toit, Roelof Sten	South Africa	2		1 .	50%	Ö	0	-	- 1	_	0	-
אַן י	arren, Brian Leigh	South Africa	4		0	-	ŏ	0	-		_		7%
ŀ pB	rown, Jacqueline	South Africa	20	1	5	75%	ŏ	0	-			1 5	0%
' Α	lcaraz Lorente, Par	Spain	5	1	_	40%	ő	0	-		11 1	5 7	1%
B	alihena I. I -	, ,	1			00%	ő	0	-		5 1		0%
. ∣G	onzalez, Javier	Spain Spain	0	C		-	Ö		-	- 1	9 0	)	-
Te	ilado, Jose Maria	Spain Spain	2	2	2 1	00%	Ö	0	-				-
IFe	mandez Alvaes	Spain Guatemala	13	10	0 7	77%	Ŏ	0	-	1 3	_ ~		0%
diffed	Applicated	Guatemala es 11 and 12, Volume	26	26	5 1/	000/	0	0	-	1.	3 7		1%
								0	-	_   2			

#### Appendix 7

#### Protocol 017

# **Applicant's Per Protocol Efficacy Analyses**

# Proportion of Patients With Favorable Clinical and Microbiological Response Assessments-

Microbiologically Evaluable Population (Estimated)

	<u> </u>		Treatm	ent Gro	up			
		(N=	26 lg (A) =203)	Piper	acillin/Ta (N=1	zobactam (B)	East	s. at man
Time	l	Estima	ted Response			ted Response	Esuma	ted <sup>†</sup> Difference
Point	n	%	(95% CI)	n	%			(A-B)
DCIV	203	92.1	(88.7, 95.5)			(95% CI)	<u>%</u>	(95% CI)
<b>EFU</b>	202	89.1		193	88.0	(83.7, 92.3)	4.1	(-2.2, 10.4)
TOC			(85.2, 93.0)	191	82.1	(76.9, 87.2)	7.0	(-0.3, 14.4)
	203	86.7	(82.3, 91.1)	193	81.2	(76.0, 86.5)	5.5	(-2.2, 13.1)

<sup>†</sup>Computed from a statistical model adjusting for strata.

N = Number of microbiologically evaluable patients in each treatment group.

n = Number of microbiologically evaluable patients with assessments at the time point included in

CI = Confidence interval.

DCIV = Discontinuation of intravenous therapy

EFU = Early follow-up.

TOC = Test of cure

(Applicant's Table 32, Volume 13 of 22, page 144)

# Proportion of Patients With Favorable Clinical and Microbiologic Response Assessments At Test of Cure

Displayed by Site of Infection Stratum-Microbiologically Evaluable Population (Observed Data)

	<b> </b>	<u> </u>	Treatm	ent Group			
	М ———	(N=20	· · · · · · · · · · · · · · · · · · ·	Pipera	cillin/Taz (N≃1	zobactam (B)	Observed Difference
Site of Infection	n/m	Obset %	ved Response (95% CI)	n√m	Obser %	ved <sup>†</sup> Response (95% CI)	(A-B)
Complicated Appendicitis <sup>‡</sup> All Other Diagnoses	85/94 91/109	90.4 83.5	(84.4, 96.4) (76.5, 90.5)	82/91 75/102	90.1 73.5	(83.9, 96.3)	0.3
Overall  Computed from a statistics	176/203	86.7	(82.0, 91.4)	157/193	81.3	(64.9, 82.1) (75.8, 86.9)	10.0 5.4

Computed from a statistical model pooling across APACHE II score strata.

(Applicant's Table 33, Volume 13 of 22, page 146)

Without generalized peritonitis.

N = Number of microbiologically evaluable patients in each treatment group.

n/m = Number of patients with favorable assessment/number of patients with assessment.

CI = Confidence interval.

# Proportion of Patients With Favorable Clinical and Microbiologic Response Assessments At Test of Cure

#### Displayed by APACHE II Score Stratum-Microbiologically Evaluable Population (Observed Data)

	<u> </u>		Treatm	ent Group			
ADACHE	 	MK-0826 (N=20	03)		lin/Tazob (N=193)	actam (B)	Observed Difference
APACHE II Score	n/m	Obser %	ved <sup>†</sup> Response (95% CI)	Difference n/m		ed <sup>f</sup> Response (95% CI)	(A-B)
≤15 >15 Overall	169/192 7/11 176/203	88.0 63.6 86.7	(83.4, 92.6) (33.8, 93.5) (82.0, 91.4)	147/181 10/12 157/193	81.2 83.3 81.3	(75.5, 86.9) (61.3, 100) (75.8, 86.9)	-19.7

ted from a statistical model pooling across diagnoses strata.

N = Number of microbiologically evaluable patients in each treatment group.

n/m = Number of patients with favorable assessment/number of patients with assessment.

CI = Confidence interval.

(Applicant's Table 34, Volume 13 of 22, page 147)

Proportion of Patients With Favorable Clinical and Microbiologic Response Assessments at Ter-Displayed by Site of Infection and APACHE II Score Strate— Microbiologically Evaluable Population (Observed Data)

		46 0035 L . L lealm	ent Ciroup			
	<u> </u>	MK-0826 (g(A) (N=203)	Pipera	cillin/Tazohactam (B) (N=193)	Observed	
Stritum  Complicated Appendicitis*, APACHE II score \$15 Complicated Appendicitis*, APACHE II score \$15 All Other Diagnoses, APACHE II score \$15 All Other Diagnoses, APACHE II score \$15 Decail For overall , computed from a sutistical model pooli Without generalized peritonitis.		Observed' Response % (95% Cl) 90.2 (84.1, 96.3) 100	2/m 79/88 3/3 68/93 7/9 157/193	Observed Response % (95% CI) 89.8 (83.4, 96.1) 100 73.1 (64.1, 82.2) 77.8 81.3 (75.8, 86.9)	Differences (A-B) % 0,4 0,0 12.9 -22.2 5,4	

CI = Confidence interval

n/m = Number of patients with favorable assessment number of patients with assessment.

(Applicant's Table 35, Volume 13 of 22, page 148)

# Proportion of Patients With Favorable Clinical and Microbiologic Response Assessments at Test of Cure

Displayed by Primary Site of Infection-Microbiologically Evaluable Population (Observed Data)

Primary Site of Infection	MK-0826 1g (N=203) n/m (%)	Piperacillin/Tazobactan (N=193) n/m (%)
Stomach/Duodenum Biliary-Cholecystitis Biliary-Cholangitis Small Bowel Appendix Colon Parenchymal (liver) Parenchymal (spleen) Pelvic Inflammatory Disease Other Only 1 site indicated per patient.	9/10 (90.0) 12/13 (92.3) - 11/12 (91.7) 111/125 (88.8) 24/32 (75.0) 0/1 (0.0) - 1/1 (100) 8/9 (88.9)	7/9 (77.8) 9/9 (100) 0/1 (0.0) 7/9 (77.8) 102/113 (90.3) 23/34 (67.6) 1/2 (50.0) 0/1 (0.0) 8/15 (53.3)

N = Number of microbiologically evaluable patients in each treatment group.

n/m = Number of patients with favorable assessment/number of patients with assessment. - = No observation.

(Applicant's Table 36, Volume 13 of 22, page 150)

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### Proportion of Patients With Favorable Clinical and Microbiologic Response Assessments at Test of Cure Displayed by Gender, Age Category, and Race-Microbiologically Evaluable Population (Observed Data)

ı	<b></b>		Treatm	ent Group			
		MK-082( (N≃2	203)	Piperacillin/Tazobactam (B) (N=193)			Observed Difference (A-B)
Gender	n/m	Observed <sup>†</sup> Response n/m % (95% CI)		n/m	Observed <sup>†</sup> Response % (95% CI)		
Female Male Age Category		85.7 87.2	(77.5, 94.0) (81.5, 92.9)	48/62 109/131	77.4 83.2	(66.9, 87.9) (76.8, 89.6)	8,3 4.0
<65 ≥65 <75 ≥75 Race	154/170 22/33 167/188 9/15	90.6 66.7 88.8 60.0	(85.2, 94.5) (48.2, 82.0) (83.4, 93.0) (32.3, 83.7)	129/162 28/31 146/182 11/11	79.6 90.3 80.2 100	(72.6, 85.5) (74.2, 98.0) (73.7, 85.7) (71.5, 100)	11.0 -23.7 8.6 -40.0
African	1/1	100					<u></u>
Armenian Asian Black Caucasian Colored Hispanic Mestizo Mixed Jot specified	1/1 2/3 5/5 90/107 1/1 66/72 2/3 8/10	100 66.7 100 84.1 100 91.7 66.7 80.0	(75.8, 90.5) (82.7, 96.9) (44.4, 97.5)	2/4 4/6 81/100 1/1 57/67 2/2 9/12 1/1	50.0 66.7 81.0 100 85.1 100 75.0	(71.9, 88.2) - (74.3, 92.6) - (42.8, 94.5)	16.7 33.3 3.1 0.0 6.6 -33.3 5.0

Computed from a statistical model pooling across strata.

N = Number of microbiologically evaluable patients in each treatment group.

n/m = Number of patients with favorable assessment/number of patients with assessment. Cl = Confidence interval.

<sup>(</sup>Applicant's Table 41, Volume 13 of 22, page 156)

## Proportion of Patients With Favorable Clinical and Microbiologic Response Assessments at Test of Cure Displayed by Blinding Procedure— Microbiologically Evaluable Population

(Observed Data)

	<u> </u>		Treatme	ent Group			<u> </u>
E-b	MK-0826 l g (A) (N=203)			Piperacillin/Tazobactam (B) (N=193)			Ohanna I Dian
Enhanced Blinding Procedure	. n/m	Observ %	ved <sup>†</sup> Response (95% CI)	p/m		ved Response	Observed Difference (A-B)
No Yes	112/131 64/72	85.5 88.9	(79.4, 91.5) (81.6, 96.2)	101/126	80.2 83.6	(95% CI) (73.2, 87.1) (74.6, 92.5)	5.3

<sup>†</sup> Computed from a statistical model pooling across strata.

N = Number of microbiologically evaluable patients in each treatment group.

n/m = Number of patients with favorable assessment/number of patients with assessment.

CI = Confidence interval.

(Applicant's Table 42, Volume 13 of 22, page 157)

Proportion of Patients With Favorable Overall Microbiologic Response Assessments in the Microbiologically Evaluable Population

		Treatme	ent Group		
	<u> </u>	MK-0826 1 g (A) (N=203)	Pipe	eracillin/Tazobaciam (B) (N=193)	Estimate II rayon
Time Point OCTV OC Computed from a statistical	203 202 203	Estimated* Response 4 (95% CI) 93.6 (90.6, 96.6) 89.6 (85.8, 93.4) 89.1 (85.2, 93.1)	n 193 191	Estimated Response % (95% CI) 90.6 (86.7, 94.6) 82.6 (77.5, 87.7) 84.4 (79.5, 80.3)	% (95% CI) 3.0 (-2.8.8.8)

(Applicant's Table 47, Volume 13 of 22, page 163)

N = Number of microbiologically evaluable patients in each treatment group.

n = Number of microbiologically evaluable posients with assessment at each time point included in the analysis.

DCIV = Discontinuation of intravenous therapy; EFU = Early follow-up; TOC = Test of cure.

Proportion of Favorable Microbiologic Response Assessments at Test of Cure
Displayed by Baseline Pathogen in the Microbiologically Evaluable Population—Total Isolates
(Observed Data)

	<del> </del>		Trea	tment Group			<del></del>	
	ļ	MK-0826 (N~20	1 g (A) )3)		iperacillin/)			
Total Isolates	1 .	Obs	erved' Response			heart II	Observed Difference	
Gram-Positive Aerobic Cocci			% (95% CI)		1 4	Observed Response	r.   ''' Di	
	117/131	<b>57.3</b>	(82.7, 94.0)	93/117		(377V C)	<del></del>	
Enterocuccus	15/17	88.2	(63.6, 98.5)	<del></del>	_	(,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	4) 9.8	
Enterococcus avium	10/11	90.9	(58.7, 99.8)	9/10	90.0	(55.5, 99,	7) -1.8	
Enterococcus casseliflavors	1 -	1	(30.7, 99.0)	4/4	100	-	-9.1	
Enterococcus jaeculis	23,25	92.0	(710.000)	1/1	100			
Enterococcus faecium	6/7	85.7	(74.0, 99.0)	12/17	70.6	(44.0, 89,	n I 🤼	
Enterococcus gallinarum	1/1	100	•	1/4	25.0		·   -1,=	
Gemella morbillorum	1/1		•	0/1	0.0		60.7	
Micrococcus	1	100	-	1 -	-		100	
Staphylococcus	1/1	1	-	1/1	100		-	
Staphylococcus aureus	4/5	100		1/1	100	-	-	
Staphylococcus epidermidis		80.0	•	3/3	100	•	0.0	
Staphylococcus haemolyticus	4/4	100	-	3/4	75.0	•	-20.0	
Susphylococcus, coagulase negative	3/3	100			75.0	•	25.0	
Simplification	3/3	100		4/6	4.5	-	-	
Strepacoccia (alpha-homotorie)	5/6	83.3		7.8	66.7			
Mrspincarcus (beta-benniaria)	4/5	80.0		67	87.5		-1,2	
MAPPOCITAN (Group C)	4/4	100	-	1.3	85,7 33,3	-	-5.7	
Methodecus (Coope D)	5/5	100	-	l ra	100	-	66,7	
Streptocaccus (Group F) Streptocaccus (microscrophilic)	2/2	100	:	3/3	100		1 :-	
STREET (DOMESTICAL)	0/1	0.0	-	a t	0.0	-	0.0	
STEPHEN COM ARRIGINATION	0/1	0.0		1 :		-	-	
Streptococcus anormans	1/1	100	•	12	50.0	:	-	
Streptococcus boxis Streptococcus connellums	i iii	100	-	1/4	100	-	50,0	
Sirepinencus internedius	1/3	100	:	3.3	100	-	0.0	
Strepacoccus milleri group	2/2	100	-	3/4 4/4	73.0	-	0.0 25,0	
Management and the second seco	5/5 1/1	100		4.6	100	-	0.0	
Strephs (ссля расивонюе	1 "	100	•		1 .,	-	33.3	
Streptococcus sulventus	1/1	100	<del></del>	<del>† ::</del>	100		<del></del>	
Strepticercus immendats	2/2	100		2.2	100	-	0,0	
Streptucoccus varidans group	1/1	100		1 :		-	, u.o	
	1013	76.9	(46.2, 95.0)	15/17	86.2	463 4 00 4		
Gram-Negative Aerobic Rods	223/248	89.9	(\$5.5. 93,4)			(63.6. 98.5)	11.3	
Acinetohacier haumannii		<del></del>	140-0-3376)	199/233	85.4	(\$0,2, 89,7)	4.5	
Actneubucter eutorgoethau	2.2	100		12	100		<del></del>	
Actretobuczer twetti	4.4	100	- 1	2.3			1 1	
lercumonus hydroniala	1/1 1/1	001	-	2/2	66,7 100	•	33.3	
Healigenes forcally	176	100 100	-	-			0.0	
Campylohacter graculis Clirishes ter	121	100	· 1	-	-	:		
itrobacter amalanairea	1 - 1	-	<u> </u>	3/3 1/2	100		0.0	
itrobacter freundit	i - [		- 1	- 14	190	-		
Urchacter kareri	1 : 1	•	-	12	100 50.0	•		
The state of the s	] . [	•	•	t-i	100		•	
ikenella curnalen. Aterologier	1/4	100	· .	0 <b>∕</b> 1	0.0	-	-	
nierribacier dernamen	1/2	\$0.0	: 1	1/1 2/2	100	-	0.0	
Aletribucier cinause	1/1	100	- 1	33	100		-50.0	
Rietubuczet getyrnáne	3/3	100 100	- 1	66	100		0.0	
nternbacter intermeditus eternbacter sukazakii	:	110	- ]	- 1		: 1	0.0	
serimucier sukazakil Cherichia coli	1/1	100		t:i	100	- ]	•	
am-negative acrobic rods	142/158	89.9	(84.), 94.()	114/135			-	
umophilis parainthonus	1/1	100	- '	*19-193	84.4	(77.2, 90.1)	5.4	
fris alvel	-	-	-	1.2	50.0	- 1		
ebsiella .	4/5	90.0	-	1:1	50.0 FOD	.	-	
ehstella onymea obsiella orgenue	66	#0:0 100	- 1	2/2	100	: 1	-	
chsiella pneum mioc	1/1	100	1	4/4	100	-	-20.0	
rgovila moreaut	13/14	92.9	(66.1, 99.8)	3/3 12/17	100	-	0.0 0,0	
Work agginacions	2/2	100	-	1211	70.6	(44.0, 89.7)	22.3	
Hem mirabilis	6/7	100	-	3/3	100	_ [	-	
Here Vulgaris Indonesia	3/5	85.7 I(II)	.	3:3	100		0.0	
relommes veruginosa	1	-	· .	1/2	50.0	,	-14.3	
WAKEN PLES ALCOHOMON	21.26	80.8	60.6, 93.4)	14	100	- 1	\$0.0	
WERRING PROPERTY	· [	- '	. 73.4)	23/26	#8.5	(69.8, 97.6)	-7.7	
Wildminus mendacina	: 1	-	. }	64	100 100		-7, F -	
microment s turneri	: 1	-	. 1	ii	100	-	-	
atia marcescens nanella putrefacions	. 1	•	- 1	Let	100	. j	-	
aureun puttelaciens		100		1/1	100	1	-	
прототая рансторій із	1/1	100						